

Justin G. Randall, Esq.
Nevada Bar No. 12476
ER INJURY ATTORNEYS
1700 S. Pavilion Center Dr., Ste. 530
Las Vegas, Nevada 89135
Telephone: (702) 968-7500
Facsimile: (702) 968-7525
justin@erinjuryattorneys.com

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHELLE ELIZABETH PEREZ, individually;

Plaintiffs,

vs.

ALBERTSON'S LLC; DOES I - X, and ROE
CORPORATIONS I - X, inclusive,

Defendants.

CASE NO. 2:24-cv-01511-APG- BNW

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(Second Request)

Pursuant to LR 6.1 and LR 26.3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case ninety (90) days as set forth below:

Discovery Completed:

1. All parties have made their initial and supplemental disclosures pursuant to FRCP 26.
2. Plaintiff served Defendants with Interrogatories, Request for Admissions, and Requests for Production of Documents.
3. Defendant served Plaintiff with Interrogatories, Request for Admissions, and Request for Production of Documents.
4. Plaintiff's deposition was completed.

Discovery that remains to be completed:

1. Deposition of the Rule 30(b)(6) witness on behalf of the Defendant.
2. Deposition of Defendant's Store Manager.
3. Deposition of Plaintiff's treating physicians.

4. Both parties need to retain experts.

5. Both parties need to depose the experts retained.

6. Site inspection of the premises.

Reasons that Discovery has not yet been completed are:

The parties previously proposed mediation and all parties have now agreed to participate in the mediation. The parties agree that extending the discovery deadlines until after mediation will serve to conserve litigation expenses and encourage settlement negotiation. To effectuate the same, the parties request that discovery be continued 90 days as set forth below to allow ample time for the disclosure of experts and the scheduling of the remaining witness depositions, if mediation is unsuccessful. Due to scheduling conflicts, the earliest date the parties will be able to schedule the mediation is August or September 2025.

Therefore, the parties request an additional ninety (90) days extension so that they can participate in mediation and complete the remaining discovery. This request is not made in bad faith, with dilatory motive, or for any purposes of improper delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct the remaining discovery, given the vast amount of information and substantial damages at issue.

Proposed schedule for completing discovery:

Accordingly, the parties request the discovery deadlines be extended to allow ample time for the court to make its ruling and allow the parties to complete the remaining discovery.

The following is a list of discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Amend Pleadings and Add Parties	February 11, 2025	No Change
Initial Disclosure of Experts	July 8, 2025	October 6, 2025
Disclosure of Rebuttal Experts	August 8, 2025	November 5, 2025
Discovery Cut-Off	September 9, 2025	December 8, 2025
Dispositive Motions	October 9, 2025	January 7, 2026
Joint Proposed Pre-trial Order	November 7, 2025	February 6, 2026

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WHEREFORE, the parties respectfully request this honorable Court adopt the foregoing stipulation of the parties which will result in the new discovery deadlines.

ER INJURY ATTORNEYS

BRANDON SMERBER LAW FIRM

By: /s/ Justin G. Randall

Justin G. Randall, Esq.
Nevada Bar No. 12476
1700 S. Pavilion Center Dr., Ste. 530
Las Vegas, Nevada 89135
Attorney for Plaintiff

By: /s/ Ryan Venci

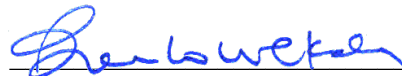
Ryan Venci, Esq.
Nevada Bar No. 7547
139 W. Warm Springs Rd.
Las Vegas, Nevada 89119
Attorney for Defendant

ORDER

IT IS SO ORDERED that the discovery deadlines are hereby extended as follows:

Scheduled Event	New Deadlines
Amend Pleadings and Add Parties	Closed
Initial Disclosure of Experts	October 6, 2025
Disclosure of Rebuttal Experts	November 5, 2025
Discovery Cut-Off	December 8, 2025
Dispositive Motions	January 7, 2026
Joint Proposed Pre-trial Order	February 6, 2026

DATED this 16 day of May, 2025.



UNITED STATES MAGISTRATE COURT

ER INJURY ATTORNEYS

By: /s/ Justin G. Randall

Justin G. Randall, Esq.
Nevada Bar No. 12476
1700 S. Pavilion Center Dr., Ste. 530
Las Vegas, Nevada 89135
Attorney for Plaintiff



Miriam Alvarez <miriam@erinjuryattorneys.com>

RE: Michelle Perez

1 message

Ryan Venci <r.venci@bsnv.law>

Thu, May 15, 2025 at 8:11 AM

To: Miriam Alvarez <miriam@erinjuryattorneys.com>, Justin Randall <justin@erinjuryattorneys.com>

Thank you for following up. I have no changes and you can submit it with my electronic signature. Thank you.

From: Miriam Alvarez <miriam@erinjuryattorneys.com>**Sent:** Wednesday, May 14, 2025 5:31 PM**To:** Justin Randall <justin@erinjuryattorneys.com>**Cc:** Ryan Venci <r.venci@bsnv.law>**Subject:** Re: Michelle Perez**CAUTION: External Sender. Please do not click on links or open attachments from senders you do not trust.**

Hi Ryan-- Following up on your approval for the SAO to Extend. Also, we received dates for the mediation with Justice Saitta. The only date she has available that works on our calendar is July 31. Let me know if that date works for you.

We asked for more dates in August just in case. Let us know. Thanks

**Miriam Alvarez**

Paralegal

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Las Vegas, Nevada 89135

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(702) 747-4625

miriam@erinjuryattorneys.com

www.erinjuryattorneys.com